

09/30/05

AF \$
DFW



EXPRESS MAIL LABEL NO. EV 485 787 140 US

SEP 29 2005

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
Before the Board of Patent Appeals and Interferences**

Applicant: Jon R. Stieber

Art Unit: 3627

Serial No. 10/004,738

Examiner: A. Rudy

Filed: December 4, 2001

For: AUTOMATIC CASH HANDLING MACHINE WITH
WIRELESS NETWORKED I/O DEVICES

Docket No: 180009.91206B

TRANSMITTAL OF BRIEF ON APPEAL

Mail Stop Appeal Brief - Patent
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

Applicant hereby submits its brief in the appeal of the final rejection of the subject patent application.

The \$500.00 fee for filing a brief and any other fees due should be charged to Deposit Account No. 17-0055.

Respectfully submitted,

By:

Michael J. McGovern
Attorney of Record
Quarles & Brady LLP
411 E. Wisconsin Avenue
Milwaukee, WI 53202-4497
(414) 277-5725

Express Mail No. EV 485 787 140 US



PATENT

Dkt No. 180009.91206B

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
Before the Board of Patent Appeals and Interferences

Applicant: Jon R. Stieber

Art Unit: 3627

Appl. No.: 10/004,738

Examiner: A. Rudy

Filed: December 4, 2001

For: AUTOMATIC CASH HANDLING MACHINE WITH WIRELESS
NETWORKED I/O DEVICES

APPELLANT'S BRIEF ON APPEAL

Mail Stop Appeal Brief - Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

Appellant, Jon R. Stieber, having filed a timely Notice of Appeal in the above identified patent application, hereby submits this brief.

I. REAL PARTY IN INTEREST

The real party in interest is the assignee, De La Rue Cash Systems Inc., an Illinois corporation.

II. RELATED APPEALS AND INTERFERENCES

There are no related appeals or interferences.

III. STATUS OF CLAIMS

Claims 2-9 and 15-21 are pending in the subject patent application and stand finally rejected. Claims 1 and 10-14 have been canceled. This appeal is taken with respect to claims 2-9 and 15-21, which are set forth in Appendix A hereto.

10/03/2005 MAHMEDI 00000081 170055 10004738

01 FC:1402 500.00 DA

QBMKE\5788097.1

IV. STATUS OF AMENDMENTS

Amendments were submitted on May 20, 2005; June 28, 2005 and August 5, 2005, but none of these have been entered by the Examiner.

V. SUMMARY OF THE CLAIMED SUBJECT MATTER

One embodiment of the present invention is illustrated in Figs. 1, 2 and 3.

RELATION OF INDEPENDENT CLAIM 15 TO THE DRAWINGS AND DESCRIPTION.

15. A cash management system (para. 0023, lines 1-9) comprising:

a first cash handling device (13, Fig. 1; para. 0015, line 3 and para. 0023, lines 7-8) for processing notes including sorting of notes, totaling of notes received, and communicating note totals (para. 0022, lines 4-5; para. 0023, lines 14-16) to at least one of: a second cash handling device (12, Fig. 1; para. 0022, lines 4-6), a visual display (20, Fig. 1; para. 0021, lines 3-6; para. 0023, lines 16-18) and communication through a network (Fig. 1, para. 0023, last three lines),

wherein said first cash handling device does not have the capability to receive or dispense coins (13, Fig. 1; para. 0023, lines 6-8 and lines 13-16);

a second cash handling device (12, Fig. 1; para. 0015, lines 1-6 and para. 0023, lines 13-15) for processing coins including sorting of coins, totaling of coins received, and communicating coin totals to at least one of: the first cash handling machine, a visual display (20, Fig. 1; para. 0021, lines 3-6; para. 0023, lines 16-18) and a network (para. 0023, last three lines),

wherein said second cash handling device does not have the capability to receive or dispense notes (12, Fig. 1; para. 0023, lines 6-8 and lines 13-16); and

wherein said first cash handling device and said second cash handling device have respective circuits (24, Figs. 2 and

3; para. 0024, all, and par. 0027, lines 1-4) for communicating through a first wireless communication network operating according to a network standard for locally distributed wireless networks operating without servers (para. 0016, lines 8-17, the Bluetooth specification); and

wherein the first cash handling device and the second cash handling device provide a cooperative cash management system in which the totals for notes and coins, respectively, are brought together through wireless communication (para. 0023, lines 14-20, para. 0022, lines 4-6 and para. 0021, lines 3-4) from these respective devices within a range of no more than 100 meters from each other (para. 0016, lines 8-17, Bluetooth specification) and are displayed on at least one of the first cash handling device (13, Fig. 1), the second cash handling device (12, Fig. 1 and Fig. 2) or a third device (20, Fig. 1) operating as a visual display no more than 100 meters from one of the first the first cash handling device and the second cash handling device (para. 0016, lines 8-17, Bluetooth specification).

VI. GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

A. THE PRIOR ART REJECTION UNDER 35 U.S.C. 103

Claims 2-9 and 15-21 were rejected under 35 U.S.C. 103 as being obvious over Amos, U.S. Pat. No. 6,554,184 in view of Watanabe, U.S. Pat. No. 4,733,765 and further in view of Richardson, U.S. Pat. No. 6,028,764. (Final action, para. 4.) The Applicant was directed to the prior Office Actions in the case. The Examiner's additional comments about inadvertent, incorrect operations are not understood.

B. REJECTION UNDER 35 U.S.C. 112, PARAGRAPH TWO

Claims 2-9 and 15-21 were rejected under 35 U.S.C. §112, second paragraph as being indefinite and failing to particularly point out and distinctly claim the subject matter of the invention for the following reasons (Final action, para. 3):

It was said that in claim 15, lines 3-4, the phrase "for processing the notes including sorting" is not clear syntax.

It was said in claim 15, lines 9-10, the phrase "for processing the notes including sorting" is not clear syntax.

It was said that in claim 15, last paragraph, line 4, that the phrase "brought together" was not clear because it was said that the term "coupled" was used in the specification in paras. 0016 and 0023.

It was said that the phrase "a visual display" in the last paragraph of claim 15, was not clear in view of "a visual display" in line 6 on the grounds that only one visual display was disclosed in the specification.

VII. ARGUMENT

A. THE CLAIMED SUBJECT MATTER IS NOT OBVIOUS OVER AMOS IN VIEW OF WATANABE AND RICHARSON.

1. OBVIOUSNESS CONSIDERATIONS UNDER 35 U.S.C. 103 AND *GRAHAM v. JOHN DEERE*.

MPEP 2141 (Aug. 2004) states that Office policy is to follow *Graham v. John Deere Co.*, 383 U.S. 1, 148 USPQ 459 (1966), in the consideration and determination of obviousness under 35 U.S.C. 103. ...[T]he four factual inquires enunciated therein as a background for determining obviousness are as follows:

- (A) Determining the scope and contents of the prior art;
- (B) Ascertaining the differences between the prior art and the claims in issue;
- (C) Resolving the level of ordinary skill in the pertinent art; and
- (D) Evaluating evidence of secondary considerations.

This section goes on to state that when applying 35 U.S.C. 103 the following tenets of patent law must be adhered to:

- (A) The claimed invention must be considered as a whole;
- (B) The references must be considered as a whole and must suggest the desirability and thus the obviousness of making the combination;
- (C) The references must be viewed without the benefit of impermissible hindsight vision afforded by the claimed invention; and
- (D) Reasonable expectation of success is the standard with which obviousness is determined.

(Emphasis supplied.)

In determining the differences between the prior art and the claims, the question under 35 U.S.C. 103 is not whether the differences themselves would have been obvious, but whether the claimed invention as a whole would have been obvious. *Stratoflex, Inc. v. Aeroquip Corp.*, 713 F.2d 1530, 218 USPQ 871 (Fed. Cir. 1983); *Schenck v. Nortron Corp.*, 713 F.2d 782, 218 USPQ 698 (Fed. Cir. 1983). MPEP 2141.02 (emphasis in original.)

MPEP 2143.01 provides that “[t]here are three possible sources for a motivation to combine references: the nature of the problem to be solved, the teachings of the prior art, and the knowledge of persons of ordinary skill in the art. *In re Rouffet*, 149 F.3d 1350, 1357, 47 USPQ2d 1453, 1457-58 (Fed. Cir. 1998) (The combination of the references taught every element of the claimed invention, however without a motivation to combine, a rejection based on a *prima facie* case of obvious was held improper.). The level of skill in the art cannot be relied upon to provide the suggestion to combine references. *Al-Site Corp. v. VSI Int'l Inc.*, 174 F.3d 1308, 50 USPQ2d 1161 (Fed. Cir. 1999).”

MPEP 2143.01 provides that: “In determining the propriety of the Patent Office case for obviousness in the first instance, it is necessary to ascertain whether or not the reference teachings would appear to be sufficient for one of

ordinary skill in the relevant art having the reference before him to make the proposed substitution, combination, or other modification." *In re Linter*, 458 F.2d 1013, 1016, 173 USPQ 560, 562 (CCPA 1972)."

MPEP 2143.03 provides that all claim limitations must be taught or suggested. "To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). All words in a claim must be considered in judging the patentability of that claim against the prior art." *In re Wilson*, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970)."

The above points of law are cited as relevant to this appeal, because it will be shown that the Office Actions: 1) have not properly determined the content of the prior art, 2) have not properly determined the differences between the claimed subject matter and the prior art, and 3) have not considered the motivation factor in combining references in the prior art.

2. INDEPENDENT CLAIM 15 IS NOT OBVIOUS IN VIEW OF AMOS IN VIEW OF WATANABE AND RICHARDSON.

For the prior art ground of rejection, independent claim 15 will be argued alone.

Claims 2 and 16 will be argued separately as providing additional patentable subject matter when the claims are considered as a whole.

Claims 3, 4 and 18 will be argued separately as providing additional patentable subject matter when the claims are considered as a whole.

Claims 5, 6, 7, 9, 17, 20 and 21 will be argued as a group as providing additional patentable subject matter when the claims are considered as a whole.

Claim 8 will be argued separately as providing additional patentable subject matter when the claims are considered as a whole.

Claim 19 will be argued separately as providing additional patentable subject matter when the claims are considered as a whole.

Claim 21 will be argued separately as providing additional patentable subject matter when the claims are considered as a whole.

a. THE OFFICE ACTION OF APRIL 21, 2004 DOES NOT FORM A PROPER FINAL REJECTION IN THIS APPLICATION.

The present request for continued examination (RCE) did not result in any new evaluation of the claims, or of the prior art in the record, and resulted in only cryptic comments by the present Examiner, other than to incorporate by reference what a previous Examiner had written regarding different claims. For an Examiner's reading of claim 15 on Amos and the other references, one has to return to the Office Action of April 21, 2004, which was two Office actions and four advisory actions back into the record. The claims at that time were substantially different than currently presented.

The Office Action of April 21, 2004, page 2, last two lines and page 3, lines 1-10 concluded that claim 15 and claims 2-4, 15, 16 and 19 were not patentable over Amos in view of Watanabe on the grounds that even though the claims recited a coin processing device and a note processing device, that this did not prevent the reading of the claims on a pair of ATM machines, each performing both coin processing and note processing, unless each device in the claims was limited to processing coins only, and notes only, respectively.

In response to this Office Action, the Applicant filed a request for continued examination (RCE) and amended claim 15 to recite that the first cash handling device (the note handling device) does not have the capability to receive or dispense coins and the second cash handling device (the coin handling device) does not have the capability to receive or dispense notes. Nevertheless, the Office actions have ignored this amendment in repeating the rejection of April 21, 2004, by reference.

Claims 5-8 17 and 18 related to specifically claiming operation of a front-end wireless network according to the Bluetooth protocol or other short-distance, local network protocols, and the addition of a back-end network using the Internet. By "back-end" it is meant that it is not part of the basic local network between the devices recited in claim 15; it is a second link to other distant computer equipment, but only in dependent claims 3 and 18. It is distinguished as not being the network that is recited in claim 15.

The Office Action of April 21, 2004, rejected claims 5-8 17 and 18 over Amos in view of Watanabe and Richardson, saying that it would be obvious to substitute the Bluetooth communication of Richardson for the wireless communication of Amos. The problem with this conclusion is that Amos doesn't teach wireless communication between ATM's as shall be demonstrated below.

It is noted here, that the Office action improperly grouped the claims in making these rejections. Claims 3 and 18 corresponded to each other, but were grouped in different groups of claims. They will be argued separately as further distinguishing from Amos, Watanabe and Richardson.

Finally, the Office Action of April 21, 2004, rejected claim 9 over Amos in view of Watanabe and Erekson. Erekson was said to disclose a piconet and it was said that it would be obvious to substitute a piconet into Amos.

b. REASONS THAT ONE OF ORDINARY SKILL IN ART WOULD NOT
COMBINE THE TEACHINGS OF AMOS AND WATANABE AS
SUGGESTED IN THE FINAL ACTION.

The problem in the invention is how to provide a local wireless network for cash management in a bank or retail enterprise (See para. 0003 and 0004, specification).

Amos discloses ATM machines that handle both coins and notes, however, to communicate with each other they must communicate over an Internet, a satellite communications network or a telephone network (Amos, Fig. 2, element N).

Although these networks are implied as being wireless by the conclusions in the Office actions, they are only in part wireless and in part they are long range wired networks using large servers (Amos, Fig. 2, CDBS/F) back at the financial institution to control the network. The distance between machines is over 100 meters when going back to the financial institution.

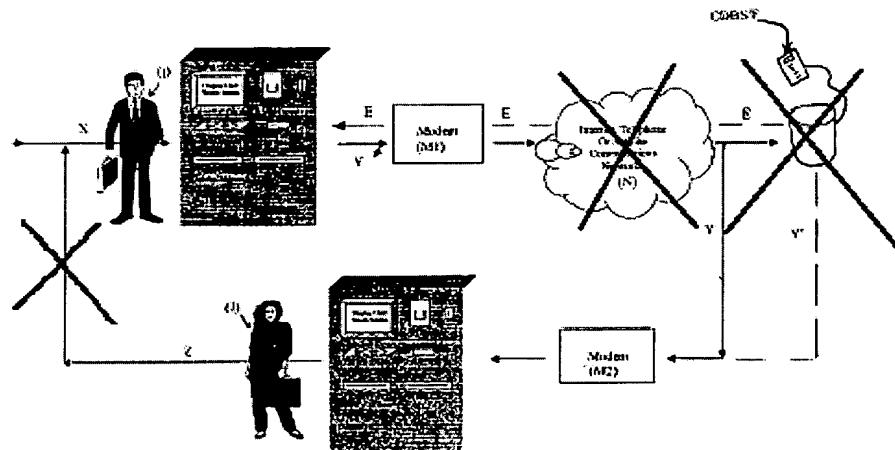
Watanabe was cited simply to show the internal functions of an ATM machine that can handle both unsorted batches of coins and unsorted batches of notes.

Richardson was not applied in the rejection of claim 15 in the Office Action of April 21, 2004. It is applied in the final action of April 6, 2005, as if it was. Richardson shows a laptop computer with a detachable display that utilizes wireless communication in a very localized setting, probably within a single room. This does not suggest anything about larger commercial systems that may occupy spaces up to 100 meters. Also, the display in Richardson is an I/O device. I/O devices are added by dependent claims 2 and 16 to be argued separately. The screen in Richardson is not the equal of another computer, it is merely an I/O device with a limited display function. It is certainly not another cash handling device.

c. PATENTABLE DIFFERENCES IN CLAIM 15 NOT FOUND IN
AMOS, WATANABE AND RICHARDSON EVEN IN COMBINATION.

First, with the invention in claim 15, there is wireless communication between a first cash handling device for handling notes only and a second cash handling device for handling coins only in a system without going back through a server. Amos, Fig. 2 below, does not show wireless communication between two ATM machines as signified by the first "X" below. Second, the network of cash handling devices of claim 15 is very localized in having a range of typically no more than 100 meters. Such a network would not be used between ATM machines which are located at sites a further distance apart as shown in Amos. On the other hand, the network of the invention is larger than

shown in Richardson which only shows communication between a laptop computer and I/O devices. None of the prior art could be used to provide a system to be used by a teller in a bank or drive-in bank as described in paragraph 0023 of the specification herein and claimed in claim 15.



Amos, U.S. Pat. No. 6,554,184, Fig. 2 (annotated)

In addition, the lines between the two people in Fig. 2 of Amos are not a form of electronic communication, they are input data X and retrieved data Z. They signify a user inputting or receiving information from respective machines. There is no wireless electronic communication (See Amos, col. 2, lines 5-27). Therefore, a first "X" is made there with respect to electronic communication as claimed.

In addition in Amos, there is Internet, satellite communications or the telephone network (N) and server (CDBS/F) to communicate between ATM machines, which is made unnecessary by the present invention and is excluded by claim 15 as denoted by the second and third "X's" above in the Figure of Amos.

d. REASONS IN SUPPORT OF A CONCLUSION OF NONOBVIOUSNESS
IN THIS CASE.

First, the reading of the claims by the Examiner does not provide a prima facie case of obviousness due to a misunderstanding of the Amos reference.

Second, the claimed differences from the prior art cited above are nonobvious, because only the inventors have recognized the problem in the art of providing a local system with a plurality of cash handling machines that handles notes and coins, respectively, but is wireless. Most of the prior art either doesn't know about this type of system, or doesn't offer this type of system, due to the different nature of their businesses (ATM machines for example).

Third, only the inventors have recognized a system that allows for adding I/O devices to the above system and fourth, then add a back-end connection to the Internet to a central accounting computer, for example.

For these reasons, it respectfully requested that claims 15 be allowed, and the Examiner's action be overruled or withdrawn.

3. DEPENDENT CLAIMS 2 AND 16 ARE NOT OBVIOUS IN VIEW OF AMOS IN VIEW OF WATANABE AND RICHARDSON.

Claims 2 and 16 add the further subject matter of I/O devices, wherein the I/O devices communicate through the first wireless communication network, and wherein the I/O devices are selected from a group consisting of: a printer, a scanner, a visual display, a keyboard, a cell phone, a pager, a personal digital assistant and a personal computer.

This subject reads on the detachable screen display in Richardson, but it means that Richardson does not then provide one of the cash handling machines of claim 15 or necessarily suggest a wireless link between such machines. There is no motivation or teaching in Amos or Richardson to create a wireless short range link between the ATM machines in Amos.

4. DEPENDENT CLAIMS 3, 4 AND 18 ARE NOT OBVIOUS IN VIEW OF AMOS IN VIEW OF WATANABE AND RICHARDSON.

These claims add the subject matter wherein at least one of said first cash handling device and said second cash handling device is electrically connected to a second network selected from a group consisting of: the Internet, an intranet, a LAN and a WAN.

This is the type of network seen in Amos for electrically connecting the ATM machines through a server back at the financial institution.

If the subject matter of claims 3 and 18 reads on the network connection in Amos, a separate wireless network connection between cash handling devices is not seen in Amos. There is no motivation or teaching in Amos or Richardson to create a wireless short range link between the ATM machines in Amos as opposed to using a long range network including wired portions and servers.

5. DEPENDENT CLAIMS 5, 6, 7, 9, 17 AND 20 ARE NOT OBVIOUS IN VIEW OF AMOS IN VIEW OF WATANABE AND RICHARDSON.

These claims include the limitation wherein the wireless communication network operates according to the Bluetooth specification or according to various features of the Bluetooth specification such as a frequency hopping, spread spectrum range of frequencies in a range from 2.4 GHz to 2.56 GHz. or operation in a piconet. The Office Actions rely on Richardson or Erekson in rejecting the combination of this subject matter with the subject matter of claim 15. Erekson discloses a Bluetooth connection between a handheld device and a computer. Despite generalized language about the application of Bluetooth, there is no disclosure of an embodiment in Richardson or Erekson suggesting the use of Bluetooth radio modules in a cash handling network of the type claimed in claim 15, with or without I/O devices.

6. DEPENDENT CLAIM 8 IS NOT OBVIOUS IN VIEW OF AMOS IN VIEW OF WATANABE AND RICHARDSON.

This claim includes the limitation wherein the wireless communication network operates in an infrared frequency range according to the IrDA standard. Although IrDA is disclosed and claimed in the present invention as a local wireless network, it does not have the range of Bluetooth, and is not as advantageous for the present invention. The use of such a network between cash handling machines would not be obvious to Richardson or Erekson for the same reasons as the Bluetooth network discussed above.

7. DEPENDENT CLAIM 19 IS NOT OBVIOUS IN VIEW OF AMOS IN VIEW OF WATANABE AND RICHARDSON.

This claim includes the limitation wherein said first cash handling machine will accept batches of notes of unsorted denominations and said second cash handling machine will accept batches of coins of unsorted denominations. This distinguishes from Watanabe and Amos because it claims two separate machines, not one ATM machine with both of these functions.

It is not obvious to subdivide the ATM machines of Amos and Watanabe into a coin handling machine and a note handling machine communicating via a Bluetooth network.

8. DEPENDENT CLAIM 21 IS NOT OBVIOUS IN VIEW OF AMOS IN VIEW OF WATANABE AND RICHARDSON.

This claim includes the limitation wherein the second cash handling device is a master unit and the first cash handling device is a slave unit. There is no disclosure in Amos that one ATM is a master unit and another ATM is a slave unit as there is no direct communication between the ATMs.

B. THE CLAIMS 2-9 AND 15-21 ARE NOT INDEFINITE UNDER 35 U.S.C. 112, SECOND PARAGRAPH.

The Examiner indicated during the Interview that the first rejection of claim 15, could be resolved by placing a comma

after the word, "notes" in line 3 and "coins" in line 9, and this has been proposed in the amendment.

The Applicant submitted such an amendment on June 9, 2005, and the first advisory action. The advisory action was ambiguous, but apparently the amendment was not entered. The proposed change by the Examiner is unnecessary and is not essential to the issues on appeal.

In response to Applicant's concern expressed during the Interview that any amendment would be considered a new issue, the Examiner's Interview Summary of May 24, 2005, indicated that an amendment on the issues stated would be considered "on its merits."

The only reason given in the second advisory action of June 9 for not entering the amendment of May 20, 2005, was that it did not amend the "brought together" language.

In a spirit of compromise, Applicant has proposed to amend the language in place of "brought together" without any concession that such amendment was necessary, but solely to remove the issue from the examination.

However, the issues raised by the Examiner have been, and continue to be, largely immaterial and are usually resolved by an Examiner's amendment.

It is believed that the rejection is not well grounded for the following reasons:

1. The words "brought together" and "coupled" have no interrelationship as implied by one of the advisory actions.

2. The specification and claim 15 makes clear that the devices communicate wirelessly and are not connected physically or through wired networks or servers like the cited prior art, as illustrated by the passages quoted below.

3. What is being "brought together" in claim 15 is the totals for coins and the totals for notes from the respective machines 12, 13. These totals are brought together for display and this is clear from the context of the remaining claim language, and from many passages in the specification as well

as the drawings. This is not in any way rebutted by the word "coupled" in para. 0023.

4. On the other hand, the word "coupled" in para. 0023 should be read as "wirelessly coupled" or "communicatively coupled" as appears elsewhere in the specification.

Paragraph 0010, in relevant part, states:

Preferably, the cash handling devices are linked via RF communication devices employing one of the industry standard specifications, such as the Bluetooth specification, the IrDA specification, the Home RF specification or the SWAP protocol (an enhancement of the IEEE 802.11 standard). (Emphasis added.)

Paragraph 0014, in relevant part, states:

The automatic cash handling device 12, the remote peripheral devices 14, and remote cash handling devices 13 each includes a transceiver (not shown in Fig. 1) and an antenna 26 for wireless transmission and receipt of data and instructions from other devices. Both the cash handling devices 12, 13 and peripheral I/O devices 14 can preferably communicate in both directions with each other. (Emphasis added.)

Paragraph 0015, in relevant part, states:

Fig. 1 is a block diagram of a cash handling unit 12, such as a coin sorter, arranged in a wireless network with a peripheral cash handling unit 13, a note counter, and peripheral I/O devices 14, comprising a remote printer 18, a remote batch display 20 and a bar code scanner 22. (Emphasis added.)

Paragraph 0021 states in relevant part:

The cash handling device 12 can transmit data to a printer 18 or display 20 to provide batch information, error information, accounting totals, total number of coin or note denominations available, or other information. (Emphasis added.)

Paragraph 0022 states in relevant part:

As noted above, the cash handling machines 12 can also communicate with the cash handling machines 13 which provide coin sorting and counting, note sorting and

counting, and note and coin dispensing functions. Data collected by the remote cash handling machines 13 is transmitted to the cash handling device 12, which can be programmed to monitor available cash levels, and provide cash settlement and batching functions for transactions.

(Emphasis added.)

Paragraph 0023 states in relevant part:

The first cash handling device 12 is coupled to a second cash handling device 13 which provides the function of a note counter, and to three peripheral I/O devices 14. The peripheral I/O devices can be, for example, a printer 18 for printing transaction data and receipts, a batch display 20 for displaying accounting data by transaction, and a bar code scanner 22 for identifying each batch. The first cash handling device 12 counts and stores the value of the coins deposited, and requests a similar total of the value of notes counted from the second cash handling device 13. The results can be displayed directly on a display associated with the cash handling device 12, or transmitted to the batch display 20 or printer 18.

(Emphasis supplied.)

Paragraph 0027, third sentence states in relevant part:

The master device is communicatively coupled to a plurality of slave units via an RF link emulating an RS-232 communication cable, constructed in accordance with the Bluetooth specification. (Double emphasis added.)

It is clear that the term "coupled" in paragraph 0023 means communicatively coupled through a wireless network as is clear from the rest of the specification.

It is also clear from paras. 0010, 0014, 0015, 0022, 0023 and 0027 that the note totals and coin totals are communicated to one or the other of the machines for display or to a remote display. The phrase "brought together through wireless communication ... and displayed" was simply for emphasis and is believed to be understandable by an ordinary person, and is certainly understandable to an engineer working in coin processing equipment.

Paragraph [0023] of the specification, in relevant part, states:

The automatic cash handling device 12 counts and stores the value of the coins deposited, and requests a similar total of the value of notes counted from the remote cash handling device 13. The results can be displayed directly on a display associated with the automatic cash handling device 12, or transmitted to the batch display 20 or printer 18. (Emphasis added.)

It is clear from this description in paragraph 0023 that the totals from both machines 12 and 13 can be communicated to a display associated with device 12 or to the display 20 for display.

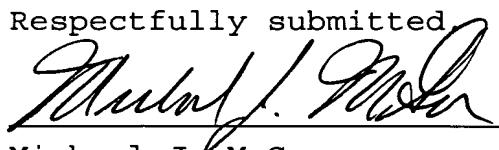
This also answers the Examiner's last objection under 35 U.S.C. 112 in the final action. It also noted that the display is recited in claim 15 as a matter of functioning of the cash handling devices. It is not a positively recited element, so as to be subject to the rule regarding antecedents. The display 20 is added as a positively recited element in claim 2.

The other claims all depend directly or indirectly from claim 15. None of the claims depending from claim 15 were objected to. On this ground of rejection, all of the claims should be treated as a group with claim 15 from which they depend.

Applicant respectfully requests the Board to overrule the Examiner on this issue. And, however, the Board decides on this issue, it is respectfully requested that the Board still decide that claims 2-9 and 15-21 are not obvious over the cited and applied prior art.

Respectfully submitted,

By:



Michael J. McGovern
Quarles & Brady LLP
411 East Wisconsin Avenue
Milwaukee, WI 53202-4497
(414) 277-5725
Attorney of Record

APPENDIX A

Claims on Appeal in Patent Application No. 10/004,738

1. (Canceled)

2. (Previously presented) The cash management system of claim 15, further comprising I/O devices, wherein the I/O devices communicate through the first wireless communication network, and wherein the I/O devices are selected from a group consisting of: a printer, a scanner, a visual display, a keyboard, a cell phone, a pager, a personal digital assistant and a personal computer.

3. (Previously presented) The cash management system of claim 15, wherein at least one of said first cash handling device and said second cash handling device is electrically connected to a second network selected from a group consisting of: the Internet, an intranet, a LAN and a WAN.

4. (Previously presented) The cash management system of claim 3, wherein said at least one of said first cash handling device and said second cash handling device is connected to the second network through a wireless communication connection.

5. (Previously presented) The cash management system of claim 15, wherein the wireless communication network operates according to the Bluetooth specification.

6. (Original) The cash management system of claim 5, wherein the wireless communication network further operates according to the RS-232 protocol.

7. (Previously presented) The cash management system of claim 15, wherein the wireless communication network operates in a frequency hopping, spread spectrum range of frequencies in a range from 2.4 GHz to 2.56 GHz.

8. (Previously presented) The cash management system of claim 20, wherein the wireless communication network operates in an infrared frequency range according to the IrDA standard.

9. (Previously presented) The cash management system of claim 15, wherein the wireless communication network operates in a piconet distinguished from other networks by a selected frequency hopping sequence.

10. (Canceled)
11. (Canceled)
12. (Canceled)
13. (Canceled)
14. (Canceled)
15. (Previously presented) A cash management system comprising:

a first cash handling device for processing notes including sorting of notes, totaling of notes received, and communicating note totals to at least one of: a second cash handling device, a visual display and communication through a network,

wherein said first cash handling device does not have the capability to receive or dispense coins;

a second cash handling device for processing coins including sorting of coins, totaling of coins received, and communicating coin totals to at least one of: the first cash handling machine, a visual display and a network,

wherein said second cash handling device does not have the capability to receive or dispense notes; and

wherein said first cash handling device and said second cash handling device have respective circuits for communicating through a first wireless communication network operating according to a network standard for locally distributed wireless networks operating without servers; and

wherein the first cash handling device and the second cash handling device provide a cooperative cash management system in which the totals for notes and coins, respectively, are brought together through wireless communication from these respective devices within a range of no more than 100 meters from each other and are displayed on at least one of the first cash handling device, the second cash handling device or a third device operating as a visual display no more than 100 meters from one of the first the first cash handling device and the second cash handling device.

16. (Original) The cash management system of claim 15, further comprising a plurality of I/O devices which communicate through the first wireless communication network to at least

one of said first cash handling machine and said second cash handling machine.

17. (Original) The cash management system of claim 20, wherein the first wireless communication network operates according to the Bluetooth specification.

18. (Original) The cash management system of claim 17, wherein said at least one of said first cash handling device and said second cash handling device communicates through the wireless communication network to a second network selected from a group consisting of: the Internet, an intranet, a LAN and a WAN.

19. (Original) The cash management system of claim 15, wherein said first cash handling machine will accept batches of notes of unsorted denominations and said second cash handling machine will accept batches of coins of unsorted denominations.

20. (Original) The cash management system of claim 15, wherein the first wireless communication network operates according to the local wireless network specification and in which a range of communication is limited to approximately 100 meters.

21. (Original) The cash management system of claim 15, wherein the second cash handling device is a master unit and the first cash handling device is a slave unit.

APPENDIX B
Factual Evidence in Application No. 10/004,738
Submitted as part of Appeal Brief.
(None)

APPENDIX C

**Related Proceedings in Application No. 10/004,738
Submitted as part of Appeal Brief.**

(None)